

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**UNITED STATES OF AMERICA and
COMMONWEALTH OF
MASSACHUSETTS *ex rel.* JULIO
ESCOBAR and CARMEN CORREA**

Relators–Plaintiffs,

v.

**UNIVERSAL HEALTH SERVICES, INC.,
UHS OF DELAWARE, INC., and HRI
CLINICS, INC.**

Defendants.

C.A. No. 11-CV-11170-DPW

JOINT STATUS REPORT

In response to the Court’s April 22, 2020 Order (ECF No. 309) that the Parties submit a joint status report by May 1, 2020 concerning the status of settlement negotiations, the Commonwealth of Massachusetts (the “Commonwealth”) and Relators Julio Escobar and Carmen Correa (collectively, the “Relators”), together with Defendants Universal Health Services (“Universal”), UHS of Delaware, Inc. (“UHS-DE”), and HRI Clinics, Inc. (“HRI”) d/b/a Arbour Counseling Services (“Arbour”) (collectively, “Defendants”) jointly file this status report.

As noted previously, the United States, the Commonwealth, and Defendants have agreed in principle on a settlement, and Relators have determined that they will assent to the settlement agreement, thus eliminating the prospect of litigation regarding the agreement. Since the last status report, the parties have agreed on all of the settlement terms, and intend to execute the settlement documents immediately upon resolution of the parallel matters that are pending but

very close to resolution in Philadelphia. The parties anticipate that such parallel matters will be resolved by the end of June, 2020, though timing depends in part on final approvals from the participating states and HHS-OIG. To account for the additional time needed to finalize resolution of the parallel proceedings, and to allow for the requisite approvals of the final agreement by the Executive Office of Health and Human Services, the parties respectfully request that the Court extend the stay of this matter until the parallel settlement is finalized and the requisite approvals have been obtained. The parties submit that just cause exists for this extension, as they have agreed to the terms of a settlement that will resolve all civil monetary claims both in this matter and the related case of *U.S. ex rel. Correa v. Universal Health Services, Inc., et al.*, No. 1:17-cv-11843-DPW.¹ No purpose would be served by lifting the stay at this stage.

Accordingly, the parties respectfully request that the Court extend the stay of this matter as set forth above.

Respectfully submitted,

COMMONWEALTH OF
MASSACHUSETTS

By its attorney,

MAURA HEALEY
Attorney General

Dated: May 1, 2020

/s/ Philip Schreiber
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¹ The sole remaining matters before this Court being the Relators' claims to attorneys' fees, costs, and expenses pursuant to 31 U.S.C. § 3730(d)(1) and (d)(2) and an attorney's lien asserted by the Relators' former counsel.

UNIVERSAL HEALTH SERVICES, INC.,
UHS OF DELAWARE, INC., AND HRI
CLINICS, INC.

By their attorneys,

Dated: May 1, 2020

/s/ Katrina C. Rogachevsky
Mark W. Pearlstein (BBO #542064)
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JULIO ESCOBAR &
CARMEN CORREA

By their attorneys,

Dated: May 1, 2020

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CERTIFICATE OF SERVICE

I certify that, on May 1, 2020, this document (filed through the ECF system) will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Katrina C. Rogachevsky
Katrina C. Rogachevsky